

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: ALICE GRACE FORD
DEBTOR**

**CASE NUMBER: 20-11770
CHAPTER 13**

**OBJECTION TO NOTICE OF POSTPETITION
MORTGAGE FEES, EXPENSES, AND CHARGES [DKT #40]**

COMES NOW, Alice Grace Ford, by and through attorney of record, Sarah A. Baker, and files this her Objection to Notice of Postpetition Mortgage Fees, Expenses, and Charges [Dkt #40] filed by Paramount Financial Group, LLC ("Creditor"), by and through its authorized agent, D. Anthony Sottile, pursuant to F.R.B.P. 3002.1, and would state unto the Court as follows:

1. Creditor filed its Notice of Postpetition Mortgage Fees, Expenses, and Charges alleging attorney fees in the amount of \$500.00 and more specifically, for the filing of a Motion to Reconsider. Debtor would object to such an amount as excessive and unfounded.

2. On October 9, 2020, Debtor filed an Objection to Claim (Dkt #23) and a response deadline for said Objection was set for November 9, 2020.

3. As no response was timely filed, the Court entered an Order Sustaining the Objection to Claim filed by Debtor (Dkt #25).

4. On November 24, 2020, Creditor filed a Motion to Reconsider (Dkt #28) asking the Court to set aside the Order (Dkt #25) and reconsider the Objection to Claim (Dkt #23).

5. Debtor timely filed a Response (Dkt #32) to said Motion to Reconsider and the matter resulted in resolution and was memorialized by Agreed Order (Dkt #38).

6. Said Agreed Order did not award any attorney fees to Creditor at the expense of the Debtor in relation to the Motion to Reconsider filed as no such agreement ever transpired.

WHEREFORE, PREMISES CONSIDERED, your Movant prays that this Honorable

Court disallow the Notice of Postpetition Mortgage Fees, Expenses, and Charges (Dkt #40) as filed and that the plan payment not be changed until a hearing upon this matter is held.

Debtor further prays for such other additional and general relief as the Court deems just and equitable.

Respectfully submitted this the 15th day of December 2021,

Alice Grace Ford

/s/ Sarah A. Baker
C. Gaines Baker, 8643
Sarah A. Baker, 105797
Jessica Jenkins Aldison, 105864

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CERTIFICATE OF SERVICE

I, Sarah A. Baker, do hereby certify that I have this day electronically filed the above and foregoing Objection to Notice of Mortgage Change, Expenses and Charges with the Clerk of the U.S. Bankruptcy Court using the ECF system which sent notification of such filing to the following:

Office of the U.S. Trustee - USTPRegions05.AB.ECF@usdoj.gov

Case Trustee: Locke D. Barkley - sbeasley@barkley13.com

D. Anthony Sottile, Authorized Agent for Creditor - bankruptcy@sottileandbarile.com

Dated: December 15, 2021

/s/ Sarah A. Baker

C. Gaines Baker, 8643

Sarah A. Baker, 105797

Jessica Jenkins Aldison, 105864